PHASE 4
TASK COMPLETION REPORT
FOR 2009 CONSTRUCTION SEASON

RICHARDSON FLAT TAILINGS SITE

EPA SITE ID: UT980952840

November 17, 2009

Prepared for:

United Park City Mines
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USEPA Remedial Project Manager

Reviewed by: _____ Date:
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State of Utah, Department of Environmental Response and Remediation

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EPA SITE ID: UT980952840

November 1, 2010

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1.0 INTRODUCTION

This Task Completion Report (TCR) details the work completed for the Phase 4 2010 Construction Season at Richardson Flat, ID UT980952840, located approximately two miles northeast of Park City, Utah. Phase 4 remedial features are presented in Figure 1-1. The remedy selected by United States Environmental Protection Agency (EPA) at the Richardson Flat Tailings Site (Site) was split into Tasks to facilitate remedy completion and bond release procedures. Phase 4 activities encompass Tasks 7 and 12 (Fig.1-1) as presented in the Remedial Design and Remedial Action Work Plan (RD/RA, RMC 2007a).

This is the fourth TCR submitted to EPA. The work outlined in this TCR represents a portion of the fourth phase of construction. Each of the first three phases consists of individual or groups of tasks to be completed in a single construction season. The work presented in this TCR is anticipated to be completed in a single construction season. The TCR for Task 1 was submitted to EPA and approved on July 16, 2008. The Task Completion Report (TCR) for Task 1 was approved by EPA on July 16, 2008. The TCR for Phase 2 (2008 Construction Season) was submitted to EPA and approved on September 23, 2008. The Task Completion Report (TCR) for Phase 2 was approved by EPA on October 30, 2008. Task 1 and Phase 2 consisted of the first of five tasks of construction at Richardson Flat as outlined on Figure 10.2 of the RD/RA. The TCR for Phase 3 (2009 Construction Season) was submitted to EPA and approved on May 14, 2009. The Task Completion Report (TCR) for Phase 3 was approved by EPA on November 22, 2009.

A full description of Site background, investigative history, specifications, health and safety, design elements, project management and construction procedures are presented in the Remedial Design and Remedial Action Work Plan (RD/RA, RMC 2007a). This TCR is intended to act as a planning supplement to the RD/RA with a focus on stormwater runoff protection and actual remediation related construction to take place in the field.

1.1 Work Performed

Work performed in the Phase 4 2010 Construction included:

Task 7, Area B-1-W:

1) Sediment removal was conducted in the pond at the terminus of the South Diversion Ditch(SDD). This activity resulted in removal of approximately 9,775 cubic yards of contaminated material. Contaminated sediments were placed in Area B-1W-RP a new repository created in 2009 (see Figure 1-1);
2) Approximately 100 linear feet of the old diversion ditch, at the entrance to the terminus pond was filled with clay, brought to grade and reclaimed.
3) Additional materials from Park City were placed in the New Tailings Storage Area (Area B-1W-RP). Contaminated materials in B-1W-RP were capped with 6 inches of cover material. It is anticipated that this area will be closed during the construction season of 2011 or perhaps 2012.
4) Additional wetland and riparian areas were constructed in the SDD terminus pond (Figure 1-1).
5) Grading and confirmation sampling – approximately 4.250 cubic yards of fill and topsoil were moved in the reconstruction operation; and

Task 12, F-3, F-2:

1) Approximately 20,000 cubic yards of contaminated materials were place in F-2 and F-3. The materials were generated by Park City Municipal Corporation and Athens Development Corporation.
2) Temporary cover was placed on this material. It is anticipated that materials from remediation efforts on Richardson Flat will go into these areas during future remediation construction.

1.1.1 Soil Specifications

As required in the RD/RA work plan, cover and topsoil placed in upland areas contained less than 500 parts per million (ppm) lead and 100 ppm arsenic and topsoil placed in wetland areas, including the terminus pond at the South Diversion Ditch, contained less than 310 ppm lead. Cover and topsoil sample results are presented in Section 4.0 and Table 3.0 cover and topsoil materials were generated on the Site for remedial work conducted in 2010. A trammel screen was used to remove rocks and wood from a topsoil stockpile at Richardson Flat but out of the Study Area boundary. Clay cover soils were generated from stockpiles located onsite that have been confirmed during previous FCP's containing less than 500 and 100 ppm, lead and arsenic, respectively in the TCR-2.

2.0 WORK PROCEDURES

Work was conducted according to procedures presented in the Phase 4 Field Construction Plan for the 2009 Construction Season.

2.1 2010 Work Activities

Phase 4 2010 work activities in the South Diversion Ditch (SDD) terminus pond (Terminus Pond) and F-2/F-3 areas consisted of:

- Source removal;
- Placement and grading of low permeability cover soil, where required;
- Placement of topsoil, where required;
- Channel reconstruction, where required;
- Wetland construction, where required;
- Wetland and upland revegetation; and
- Cover of imported mine wastes.

The majority of remedial activity at the Site in 2010 consisted of removing contaminated sediments from the Terminus Pond, reconstruction of the pond to increase upland and wetland habitat for compensating potential Natural Resource Damages (NRD). Figure 1-1 presents work completed in 2010 in this area. Contaminated sediments were placed in the B-1W-RP repository and in F-2. Imported mine wastes from the Montage project were placed in F-2 and F-3 with a temporary cover of clean soil. Topsoil was placed in an area of covered tailings in B-1-W that had received 12 inches of clay during the 2009 FCP-3 season and was being used as a temporary topsoil storage area.

All areas containing tailings remaining in-place were covered in accordance with the RDRA (12" clay/6"topsoil). All wetland and upland areas were revegetated in accordance with the RDRA.

2.2 Source Removal

Source removal work was conducted as specified in Section 6.0 of the RD/RA. The following work procedures were conducted:

1) Excavation and construction areas were cleared and grubbed prior to the placement of materials. Clearing and grubbing included the removal of organic matter such as plants, trees and woody material, as well as any other material from the Site. Large non-organic materials such as boulders that interfered with grading were removed as required.

2) Appropriate dust control was conducted during all excavation, soil placement, transport and grading activities.

3) In order to conduct the removal water in the terminus pond had to be diverted in phases. A culvert was installed on the western extent of the pond, an earthen dyke installed and water was diverted around the majority of the pond and back into the SDD at the Embankment Wetland. Portions of the pond were allowed to

dry in order to excavate and haul contaminated sediments to the repository. Excavation was guided by observation of visual color "breaks" between the contaminated sediments and clean gravels beneath. X-Ray fluorescence (XRF) with a Niton XLP 702 analyzer was used to confirm visual observations.

4) Excavation was initiated on the upstream edge of the pond and proceeded downstream. This excavation method prevents the potential for cross-contamination. No air monitoring was conducted as all contaminated materials were saturated when encountered by excavation or haulage equipment. Any overspill generated during haulage was picked up with a loader and placed either in a haul truck or transported by the loader to the repository.

5) The existing culvert in the Terminus Pond was removed to facilitate fish movement between Silver Creek and the SDD. This was conducted to provide to provide compensation for potential Natural Resource Damages.

6) Visible tailings materials were excavated from low-lying areas subject to year-round and/or seasonal ponding or interaction with shallow groundwater. Excavation extended to the visual interface between the tailings and native soils. Tailings excavation was guided using the XRF portable meter. Excavation and transport was staged to avoid the re-contamination of clean areas.

7) Where mine waste was transported to and placed in the Impoundment or in B-1W-RP, the material was graded to conform to general site topography prior to the placement of cover soils.

8) Surfaces and subgrades were graded to approximate final configurations and contours prior to cover and topsoil placement, if required. Subgrades and final graded surfaces were confirmed by conventional survey techniques where applicable.

9) Cover and topsoil from onsite sources were screened with the XRF. A five sub-sample composite was collected for every 5,000 cyds and screened with the XRF. Greater than five-percent of the composite samples were submitted to the laboratory to confirm XRF results. All imported soil met the specifications in Section 1.1.1. Sampling protocol and analytical methodologies are described in the Field Sampling Plan (FSP, RMC, 2007b). Lab-XRF QA/QC results are presented in Table 3.

10) Cover soils selected for use at the Site were low permeability, high clay content soils typical of those found in the region. Large rock material was avoided. Clay rich soils located on-site were used as cover material using the same criteria outlined in Section 6.1 of the RD/RA for quality control.

11) Cover soils placed at the Site were compacted with tracked or equivalent equipment. Compaction methods also included rolling and/or vibrating, as necessary. Cover soils were inspected and approved by United Park or its representatives prior to topsoil placement.

12) The final cover subgrade surface was uniform to allow for the placement of a consistent topsoil layer.

Note: Items 11 through 13 are referred to as General Topsoil Procedures.

13) Final surfaces, grades and erosion control structures were approved by United Park or its representative.

14) Topsoil was screened to remove particles greater than six inches and was suitable to support vegetation. Topsoil was placed to a minimum depth of six inches and contained sufficient organic matter and nutrients to promote revegetation.

15) The seedbed consisted of topsoil placed during remedial activities. Topsoil was lightly compacted and scarified. The seedbed was roughened prior to seeding.

16) Wetland construction in the Terminus Pond consisted of additional grading and the construction of habitat features. Habitat features consisted of increasing the water edge by addition of small islands and scalloping the shoreline. Areas were over excavated into the shallow water table to provide additional aquatic habitat. Berms and dykes were used to create additional water ponding. Wetland construction is discussed further in Section 2.3. Wetland construction in the Terminus Pond area (Figure 1-1) was conducted to provide additional wetland habitat and to provide compensation for potential Natural Resource Damages.

17) Upland habitat was created adjacent to wetland areas in at the Terminus Pond by covering mine waste with at least eighteen inches and up to three feet of clay and topsoil. Upland construction is further discussed in Section 2.4 (Figure 1-1). Creation of upland habitat was conducted to provide additional compensation for potential Natural Resource Damages.

18) Revegetative seeding and related activities were completed on all remediated areas (upland and wetland).

19) The upland seed mix included a mixture of deep-rooted annual and perennial native grass and forb species. The annual species provide rapid germination to aid in short term revegetation. The short-term revegetation will decrease the runoff potential of the slope and will keep the imported soil in place. Perennial species will provide longer term, more stable revegetation. Wetland areas were revegetated with wetland specific species. Appendix C of the RD/RA contains the seed specifications for the Site.

20) Completion confirmation sampling is detailed in Section 4.0.

2.3 Cover Placement

Cover placement was conducted as specified in Section 6.0 of the RD/RA. The following work procedures were conducted:

1) Dust control measures were implemented during all excavation, soil placement, transport, and grading activities. Water was applied to work surfaces and haul roads as dust control.

2) Surfaces and subgrades were graded to approximate final configurations and contours prior to cover and topsoil placement. Subgrades and final graded surfaces were confirmed by conventional survey techniques where applicable.

3) Topsoil for remedial activities was generated from an existing onsite stockpile. All soil used in remedial activities were screened with the X-ray Fluorescence meter (XRF). In addition, five sub-sample composite samples were collected for every 5,000 cyds and sampled with the XRF. Five percent of XRF-sampled soil samples were submitted to the laboratory for QA/QC lead and arsenic analysis. All soil met the specifications in Section 1.1.1. Sampling was conducted in accordance with protocols and analytical methodologies as described in the FSP. Sample results are presented in Section 4.0. Lab-XRF QA/QC results are presented in Table 3.

4) Cover soils selected for use at the Site were low permeability, high clay content soils typical of those found in the region. Large rock material was removed prior to placement. Clay rich soils from an on-Site stockpile were used as cover material using the same criteria outlined in Section 6.1 of the RD/RA and Section 2.2 of the Phase 4 FCP for quality control.

5) Cover soils placed at the Site were compacted with tracked or equivalent equipment. Compaction methods also included rolling and/or vibrating, as necessary. Cover soils

were inspected and approved by United Park or its representatives prior to topsoil placement.

6) The final cover subgrade was graded to allow for the placement of a consistent topsoil layer.

7) Final surfaces, grades and erosion control structures were approved by United Park or its representative.

8) Completion confirmation sampling is detailed in Section 4.0.

9) Topsoil was screened to remove particles greater than six inches and was suitable to support vegetation. Topsoil was placed to a minimum depth of six inches and contained sufficient organic matter and nutrients to promote revegetation.

10) The seedbed consisted of topsoil placed during remedial activities. Topsoil was lightly compacted and scarified. The seedbed was roughened prior to seeding.

11) Wetland construction consisted of additional grading and the construction of habitat features. Wetland construction consisted of adding shoreline, water ponding and deeper pools in the Terminus Pond (Figure 1-1). In addition the culvert at the outlet to the pond was removed and the channel gradient reconstructed at 3% to facilitate migration of fish from Silver Creek onto Richardson Flat. This work was conducted to provide additional wetland habitat and to provide Natural Resource Damage offsets if any.

12) Revegetative seeding and related activities were completed on all remediated areas (upland and wetland).

13) The upland seed mix included a mixture of deep-rooted annual and perennial native grass and forb species. The annual species provide rapid germination to aid in short

term revegetation. The short-term revegetation will decrease the runoff potential of the slope and will keep the imported soil in place. Perennial species will provide longer term, more stable revegetation. Wetland areas were revegetated with wetland specific species. Appendix C of the RD/RA contains the seed specifications for the Site.

2.4 Wetland Construction

Wetland construction in the Pond area was conducted to provide additional wetland habitat and to provide compensation to any potential Natural Resource Damages. Up to date aerial photography is not available at this time to accurately portray the reconstruction of the Terminus Pond. Constructed wetland features included:

- Habitat islands;
- Excavation and grading to provide open water habitat;
- Transitional shoreline areas;
- Deepened pools (>10') to facilitate over wintering of fish species;
- Flow direction structures including dikes and swales;
- Topsoil placement; and
- Revegetation with wetland specific seed mix and plant species.

All wetland construction procedures were conducted in accordance with the procedures described in Section 2.2. All materials used in wetland construction meet the specifications described in Section 1.1.1 and Section 6.0 of the RD/RA.

2.5 Upland Construction

Upland construction was conducted in the transition areas between the new repository and the Terminus Pond, in the SDD, and an area of B-1-W (Figure 1-1). This work was conducted to provide additional upland habitat and to provide compensation to any potential Natural Resource Damages. Constructed upland features included:

- Upland habitat;
- Excavation and grading to provide upland habitat;
- Transitional upland areas;
- Topsoil placement; and
- Revegetation with upland specific seed mix and plant species.

All upland construction procedures were conducted in accordance with the procedures described in Section 2.2 and 2.3. All materials used in upland construction meet the specifications described in Section 1.1.1 and Section 6.0 of the RD/RA.

3.0 STORMWATER MANAGEMENT

Stormwater management was undertaken to:

- Reduce the potential for off-Site migration of sediments, soil and tailings; and
- Eliminate the re-contamination of areas that have been covered or have undergone source removal.

General stormwater management elements included:

- Sediment barriers and berms were placed in the South Diversion Ditch to capture sediment and prevent downstream migration.
- Hay or straw bale barriers were placed in appropriate ephemeral channel features that drain from work areas. The hay bales were placed downgradient from the silt fence or wattle barriers;
- A supply of hay or straw bales and wattle material was stored on-site during construction; and
- Stormwater runoff protection measures will remain in-place until revegetation efforts are complete.

General procedures to reduce the tracking of contaminated materials into uncontaminated areas included:

- All trucks and equipment working in contaminated materials (e.g. tailings and sediments) were decontaminated prior to working with clean materials. Decontamination procedures are described in Section 11.8 of the RD/RA;
- A stabilized construction entrance was used to remove gross contamination from trucks hauling tailings;
- All trucks and equipment were decontaminated prior to leaving the Site; and
- Dust control measures were implemented as necessary as described in Section 11.1.1 of the RD/RA.

Specific stormwater runoff protection elements implemented prior to and during construction included:

- Work areas in the SDD were isolated with a series of berms constructed from clean soil. Surface water was pumped from each area prior to and during excavation.

4.0 COMPLETION CONFIRMATION

Completion of work is based upon confirmation that the following Phase 4 2009 Construction Season Completion Milestones are complete:

1) Source removal is complete in the Pond area;
2) Cover placement is complete in B-1-W;
3) Reclamation (surface grading and drainage control) is complete;
4) Wetland construction is complete; and
5) Confirmation samples verify source removal and cover installation meets specifications.

4.1 Pond Area

Source removal in these areas was confirmed using the following methodology:

- Confirmation sampling for lead and arsenic in upland areas.
- Confirmation sampling for lead in wetland areas.

Cover placement in the B-1-W area was completed and reported in 2009. Topsoil was placed in this area during 2010 and represents the only cover activities conducted in 2010.

Wetland areas were sampled on 100-foot centers. Sample locations are presented on Figure 4-1. Source removal confirmation results are presented in Table 1.

4.2 Source Removal Confirmation

Source removal confirmation requirements are set forth in Sections 1.1 and 3.0 of the Field Sampling Plan (FSP, RMC, 2007c). Source removal confirmation samples were collected at twenty-one locations. Samples were analyzed with the XRF. Two XRF-sampled confirmation samples were submitted to the laboratory for QA/QC analysis. Source removal confirmation results are presented in Table 1. QA/QC sample results are presented in Table 3. The sampling results meet applicable standards and requirements for source removal.

4.2.1 Pond Area

As provided in the RD/RA, (RMC, 2007a), lead concentrations for source removal in Area B-1-W were set at 500 parts per million (ppm) for soils and 310 ppm for sediments. Average lead concentrations for all source removal confirmation samples in the Pond area were 132.8 ppm. Lead concentrations ranged from <55.9 to 456.5 ppm. Source removal sample results from this area are presented on Table 1. Source removal sample locations are presented on Figure 4-1.

4.2.2 Surface Water Sampling

Three surface water samples were collected to determine the effects of remediation on surface water quality. Sample results are presented in Table 2. One sample was collected at the terminus of the New South Diversion Ditch completed in 2009. This sample contained 0.0156 ppm dissolved zinc. Two samples were collected at the terminus of the Old South Diversion Ditch. The final fifty-feet of the ditch were remediated in 2010. The sample collected prior to remediation contained 1.82 ppm dissolved zinc. The sample collected after remediation contained 0.035 ppm dissolved zinc.

4.4 Imported Soil Sampling

As provided in the RD/RA, (RMC 2007a), imported soils were to be screened by using procedures described in the FSP (RMC, 2007c). During this construction season only clean onsite soil sources were used primarily for vegetative growth that is topsoil. Construction materials for the islands, berms and dykes in the Terminus Pond were composed of onsite clean fill. In accordance with these standards, imported soil sources were screened with the XRF. No imported soil samples were sampled with the XRF. Soil sample results are presented in Table 2. All cover and topsoil used in upland areas contained less than 500 ppm lead and 100 ppm arsenic. All cover and topsoil used in wetland areas contained less than 310 ppm lead. Sampling was conducted in accordance with protocols and analytical methodologies as described in the TCR and FSP.

4.5 QA/QC Sampling

In accordance with the QA/QC Plan presented in the FSP (RMC, 2007c), two of twenty-one source removal were submitted to American West Analytical Laboratories for XRF-Lab confirmation. Duplicate laboratory samples were also submitted. This exceeds the five-percent QA/QC criteria specified in the FSP. The laboratory samples contained 79.3

to 110.9 ppm lead. Relative percent differences for XRF and laboratory results ranged from 4.2% to 48.8% for lead. The high RPD values are related to the low metals concentrations in the soil samples analyzed, a small difference in low concentrations will lead to a high RPD. QA/QC sample results are presented in Table 3.

Two duplicate soil samples were submitted to American West Analytical Laboratories for QA/QC. Analytical laboratory lead concentrations ranged from 9.9 to 150 ppm. Relative percent differences for duplicate samples ranged from 23.5% to 34.3%. The high RPD values are related to the low metals concentrations in the soil samples analyzed, a small difference in low concentrations will lead to a high RPD. QA/QC sample results are presented in Table 4.

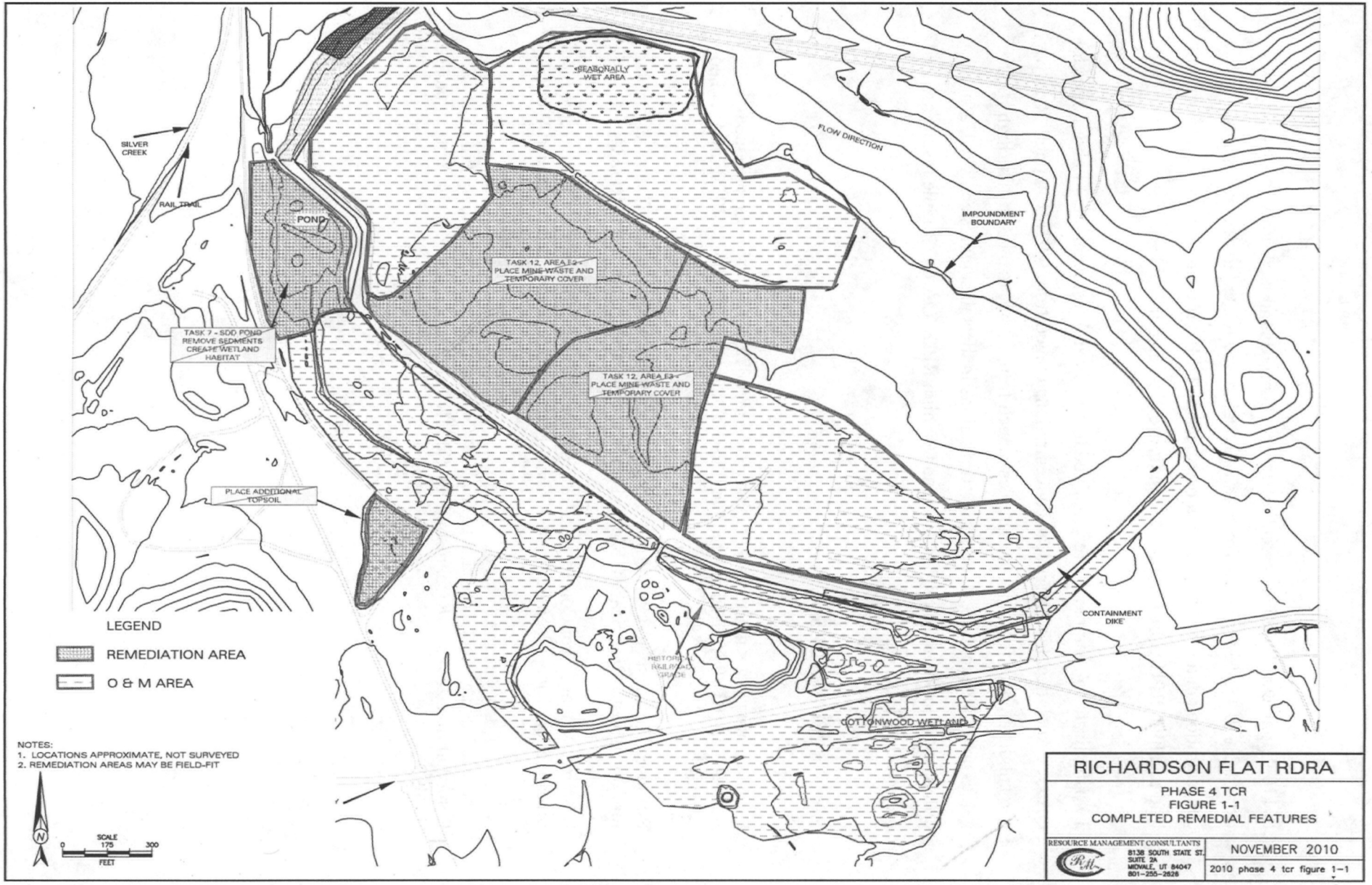
5.0 REFERENCES

Resource Management Consultants, Inc (RMC), 2007a, Remedial Design/Remedial Action Plan (RD/RA), Richardson Flat, Site ID Number: UT980952840, With Attached Work Plan.

Resource Management Consultants, Inc (RMC), 2007b, Phase 2 Field Construction Plan for 2008 Construction Season, Richardson Flat, Site ID Number: UT980952840.

Resource Management Consultants, Inc (RMC), 2007c, Field Sampling Plan, Remedial Investigation, Richardson Flat, Site ID Number: UT980952840, With Attached Work Plan.

Resource Management Consultants, Inc (RMC), 2007c, Health and Safety Policy, Remedial Investigation, Richardson Flat, Site ID Number: UT980952840, With Attached Work Plan.



RICHARDSON FLAT RDRA

PHASE 4 TCR
FIGURE 1-1
COMPLETED REMEDIAL FEATURES

RESOURCE MANAGEMENT CONSULTANTS
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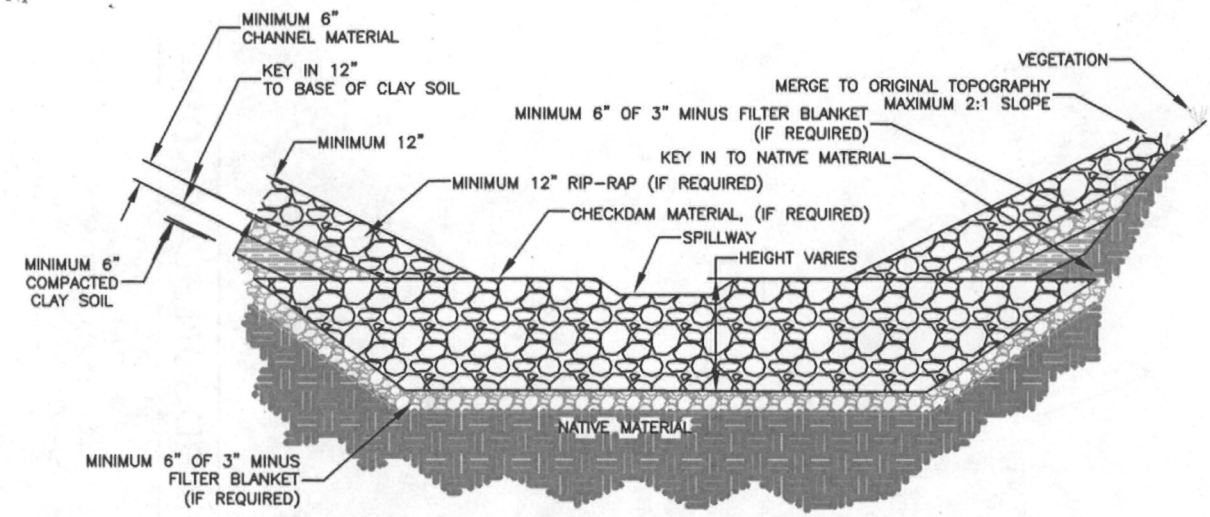
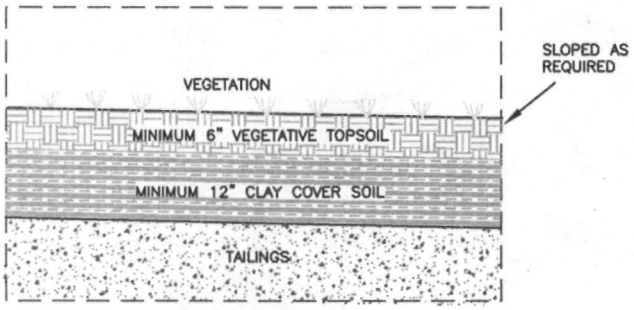
NOVEMBER 2010

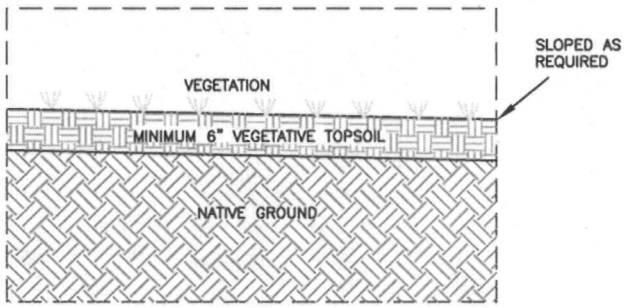
2010 phase 4 tcr figure 1-1



CHANNEL CONSTRUCTION TYPICAL DETAILS



COVER SOIL
TYPICAL DETAILS



TOPSOIL
TYPICAL DETAILS

NOT TO SCALE

RICHARDSON FLAT RDRA

TASK 4 TCR
FIGURE 2-1
CHANNEL AND SOIL COVER TYPICALS

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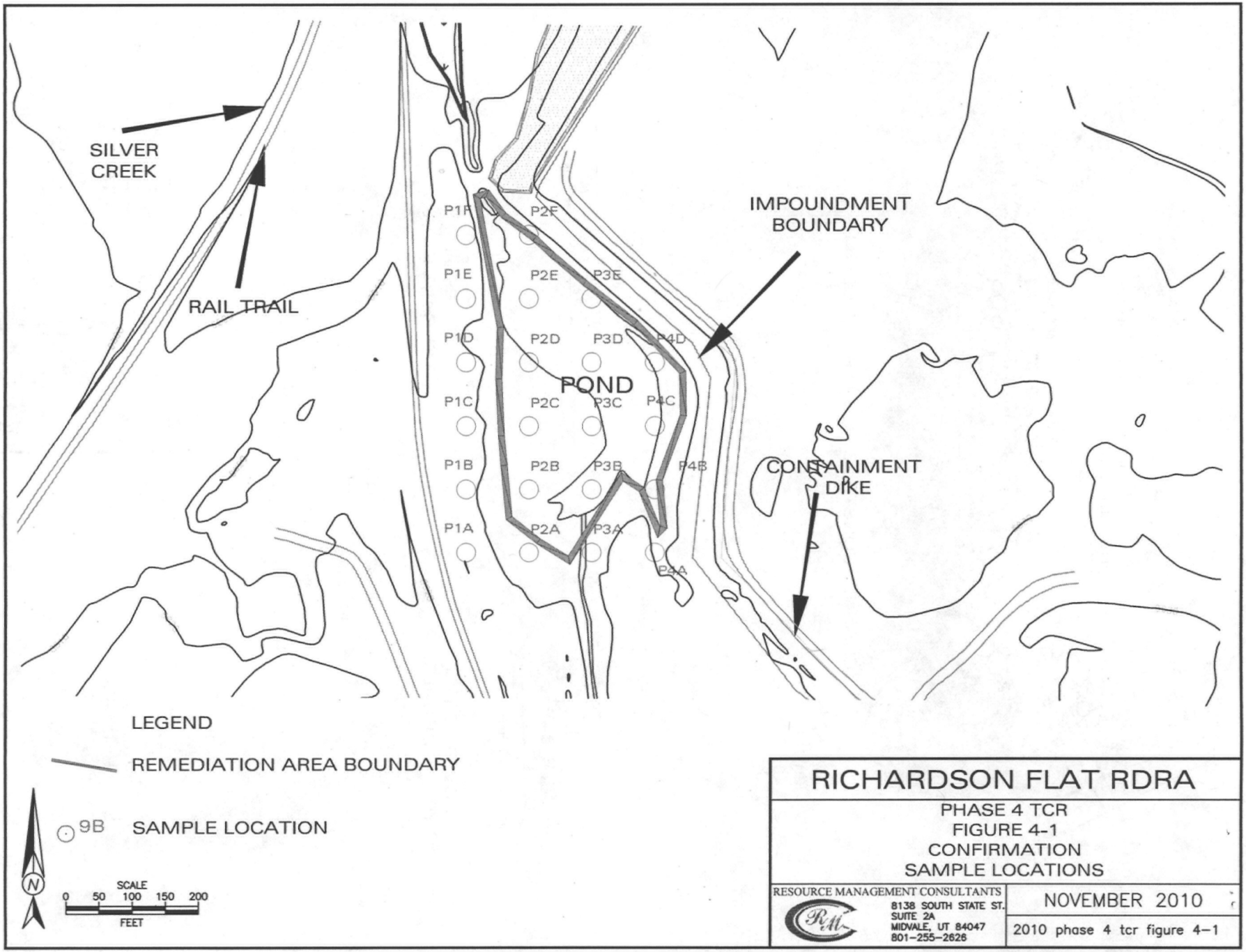
task 4 fcp fig 2-1.dwg



RICHARDSON FLAT RDRA

PHASE 4 TCR
FIGURE 4-1
CONFIRMATION
SAMPLE LOCATIONS

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NOVEMBER 2010

2010 phase 4 tcr figure 4-1

Richardson Flat

Table 1 - Source Removal Confirmation Sample Results

All Results ppm

Date	Sample ID	Pb	Method
12-Sep-10	P1A	158.2	XRF
12-Sep-10	P1B	456.5	XRF
12-Sep-10	P1C	<56	XRF
12-Sep-10	P1D	120.9	XRF
12-Sep-10	P1E	92.9	XRF
12-Sep-10	P1F	117.3	XRF
12-Sep-10	P2A	69.5	XRF
12-Sep-10	P2B	<55.9	XRF
12-Sep-10	P2C	133.3	XRF
12-Sep-10	P2D	103.8	XRF
12-Sep-10	P2E	<68	XRF
12-Sep-10	P2F	79.3	XRF
12-Sep-10	P3A	272	XRF
12-Sep-10	P3B	149.8	XRF
12-Sep-10	P3C	221	XRF
12-Sep-10	P3D	89.8	XRF
12-Sep-10	P3E	57.5	XRF
12-Sep-10	P4A	272	XRF
12-Sep-10	P4B	82.3	XRF
12-Sep-10	P4C	110.9	XRF
12-Sep-10	P4D	111	XRF
	Range:	<55.9-456	
	Mean:	132.8	

Richardson Flat

Table 2 - Water Sample Results

All results ppm

SAMPLE ID	DATE	Zinc (T)	Zinc (D)	LOCATION NOTES
SDD-2	15-Jul-10	--	0.0156	Terminus new South Diversion Ditch constructed in 2009.
RFSW-1	15-Jul-10	--	1.82	Terminus of old South Diversion Ditch just above the SDD Pond prior to remediation of the last 50 feet of the old ditch.
RF-OPP	12-Aug-10	0.033	0.035	RFSW-1 location after remediation.

Richardson Flat

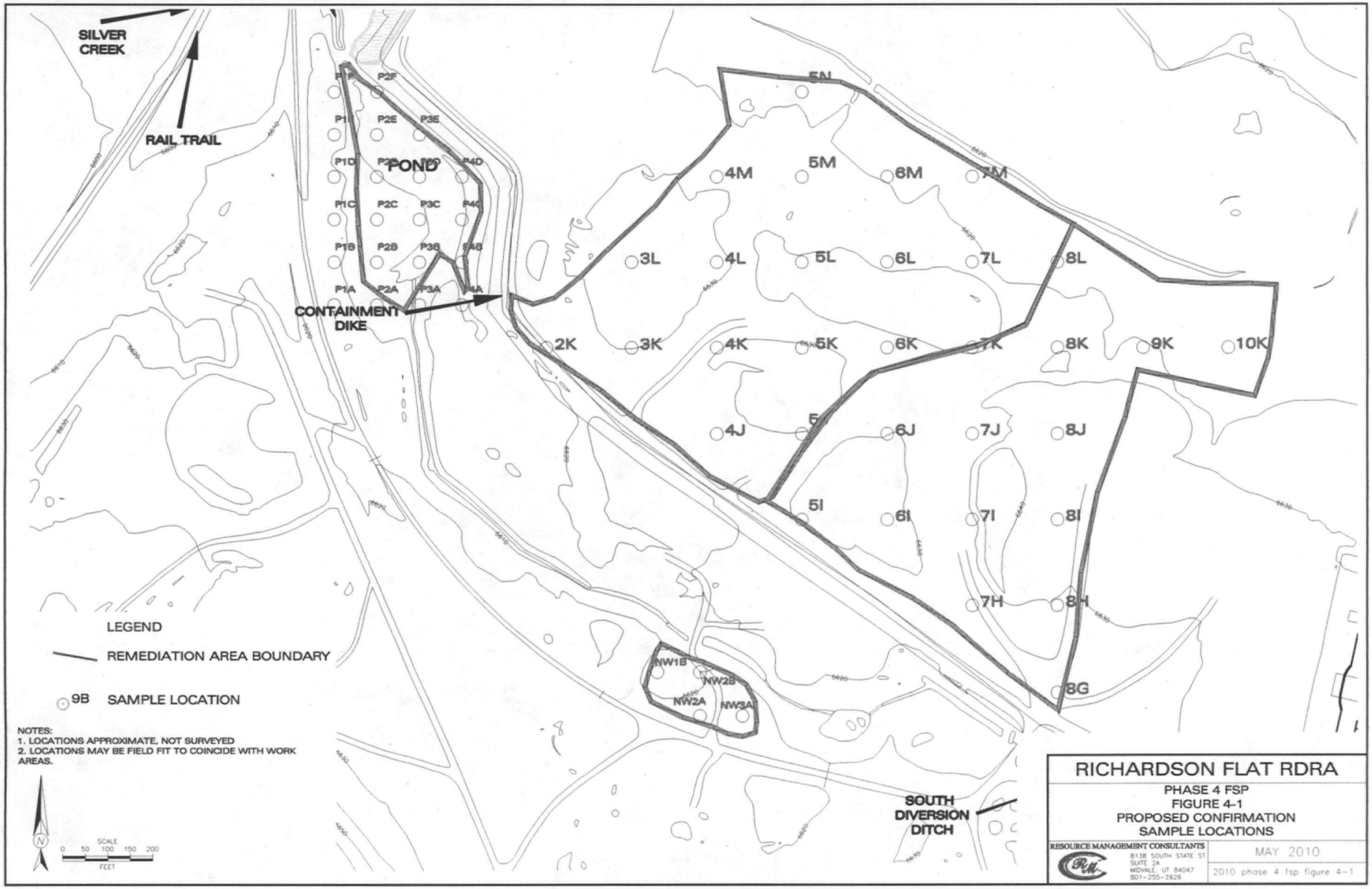
Table 3 - QA/QC Sample Results

All results ppm

XRF-LAB

Sample ID	As	Pb
P2F (XRF)	<50.9	79.3
SLP2F (LAB)	16.3	82.7
RPD (%)	**NA**	**4.2**

Sample ID	As	Pb
P4C (XRF)	<53.1	110.9
SLP4C (LAB)	9.99	67.4
RPD (%)	**NA**	**48.8**



RICHARDSON FLAT RDRA

PHASE 4 FSP
FIGURE 4-1
PROPOSED CONFIRMATION
SAMPLE LOCATIONS

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MAY 2010

2010 phase 4 fsp figure 4-1